

**UNITED STATES DISTRICT COURT  
DISTRICT OF PUERTO RICO**

In re: THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO,	)	PROMESA
	)	Title III
	)	No. 17 BK 3283-LTS
as representative of	)	(Jointly Administered)
THE COMMONWEALTH OF PUERTO RICO,	)	
<i>et al.</i>	)	
	)	
Debtors.	)	
	)	
In re:	)	PROMESA
	)	Title III
	)	No. 17 BK 4780-LTS
THE FINANCIAL OVERSIGHT AND	)	
MANAGEMENT BOARD FOR PUERTO RICO,	)	
	)	
as representative of	)	
PUERTO RICO ELECTRIC POWER	)	
AUTHORITY ("PREPA")	)	
	)	
Debtor. <sup>1</sup>	)	
	)	

**JOINT INFORMATIVE MOTION REGARDING  
COBRA ACQUISITIONS LLC'S MOTION TO LIFT THE STAY ORDER**

---

<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA") (Bankruptcy Case No. 19-BK-5233-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

Pursuant to the Court's *Order Regarding Procedures for June 16-17, 2021, Omnibus Hearing* [Case No. 17-BK-3283, ECF No. 16898], Cobra Acquisitions LLC ("Cobra"), the Puerto Rico Electric Power Authority ("PREPA"), by and through the Financial Oversight and Management Board for Puerto Rico (the "Oversight Board") and the Puerto Rico Fiscal Agency and Financial Advisory Authority ("AAFAF," and together with PREPA and the Oversight Board, the "Government Parties" and, the Government Parties together with Cobra, the "Parties"). The Parties respectfully states as follows:

1. The Parties will appear telephonically at the omnibus hearing on *Cobra Acquisitions LLC's Motion to Lift the Stay Order* [Case No. 17-BK-3283, ECF No. 16328] (the "Motion"), as well as any and all objections, responses, statements, joinders and replies to the Motion.

2. The following individuals may appear to speak on behalf of the parties:

- a. Cobra: Abid Qureshi
- b. Oversight Board: Scott P. Cooper
- c. AAFAF: Elizabeth McKeen

3. The Parties understand the Court has allocated 14 minutes for a hearing on the Motion. The Parties have agreed to allocate such time as follows, listed in the order in which the Parties will present:

- a. Cobra's Opening Argument: 5 minutes.
- b. Government Parties' Argument:
  - i. Oversight Board: 5 minutes
  - ii. AAFAF: 2 minutes
- c. Cobra's Rebuttal: 2 minutes.

**WHEREFORE**, the Parties respectfully request that the Court take notice of the above.

June 10, 2021

New York, New York

Respectfully submitted,

**O'NEILL & BORGES LLC**

By: /s/ Hermann D. Bauer

Hermann D. Bauer

USDC No. 215205

250 Muñoz Rivera Ave., Suite 800

San Juan, PR 00918-1813

Telephone: (787) 764-8181

Facsimile: (787) 753-8944

Email: hermann.bauer@oneillborges.com

**PROSKAUER ROSE LLP**

By: /s/ Paul V. Possinger

Martin J. Bienenstock\*

Paul V. Possinger\*

Ehud Barak\*

Gregg M. Mashberg\*

Eleven Times Square New York, NY 10036

Telephone: (212) 969-3000

Facsimile: (212) 969-2900

Email: mbienenstock@proskauer.com

ppossinger@proskauer.com

ebarak@proskauer.com

gmashberg@proskauer.com

\* admitted *pro hac vice*

*Attorneys for the Financial Oversight and  
Management Board and as representative of  
the Puerto Rico Electric Power Authority*

**DÍAZ & VÁZQUEZ LAW FIRM, P.S.C.**

By: /s/ Katuska Bolaños

Katuska Bolaños

kbolanos@diazvaz.com

**REICHARD & ESCALERA, LLC**

/s/ Rafael Escalera Rodríguez

Rafael Escalera Rodríguez

USDC-PR No. 122609

escalera@reichardescalera.com

/s/ Sylvia M. Arizmendi

Sylvia M. Arizmendi

USDC-PR No. 210714

/s/ Alana Vizcarrondo-Santana

Alana Vizcarrondo-Santana

USDC-PR No. 301614

vizcarrondo@reichardescalera.com

255 Ponce de León Avenue

MCS Plaza, 10th Floor

San Juan, PR 00917-1913

Telephone: (787) 777-8888

**AKIN GUMP STRAUSS HAUER & FELD  
LLP**

By: /s/ Abid Qureshi

Ira S. Dizengoff (*pro hac vice*)

Abid Qureshi (*pro hac vice*)

Philip C. Dublin (*pro hac vice*)

Steven M. Baldini (*pro hac vice*)

One Bryant Park

Bank of America Tower

New York, NY 10036

Tel: (212) 872-1000

Fax: (214) 872-1002

Email: idizengoff@akingump.com

aqureshi@akingump.com

USDC-PR 231812

pdublin@akingump.com  
sbaldini@akingump.com

290 Jesús T. Piñero Ave.  
Scotiabank Tower, Suite 11-E  
San Juan, PR 00918  
PO Box 11689  
San Juan, PR 00922-1689  
Tel. (787) 395-7133  
Fax. (787) 497-9664

--and--

*Co-Attorneys for Puerto Rico Electric  
Power Authority*

Thomas P. McLish (pro hac vice)  
Scott M. Heimberg (pro hac vice)  
Allison Thornton (pro hac vice)  
2001 K Street, N.W.  
Washington, DC 20006  
Tel: (202) 887-4000  
Fax: (202) 887-4288  
Email: tmclish@akingump.com  
sheimberg@akingump.com  
athornton@akingump.com

**MARINI PIETRANTONI MUÑIZ LLC**

*Attorneys for Cobra Acquisitions LLC*

By: /s/ Luis C. Marini-Biaggi  
Luis C. Marini-Biaggi  
USDC No. 222301  
Carolina Velaz-Rivero  
USDC No. 300913  
250 Ponce de León Ave.  
Suite 900  
San Juan, Puerto Rico 00918  
Tel: (787) 705-2171  
Fax: (787) 936-7494  
Email: lmarini@mpmlawpr.com  
cvelaz@mpmlawpr.com

*Co-Attorneys for the Puerto Rico Fiscal  
Agency and Financial Advisor Authority*

**O'MELVENY & MYERS LLP**

By: /s/ Maria J. DiConza  
John J. Rapisardi\*  
Maria J. DiConza\*  
7 Times Square  
New York, NY 10036  
Telephone: (212) 326-2000  
Facsimile: (212) 326-2061  
Email: jrapisardi@omm.com  
mdiconza@omm.com

\* admitted pro hac vice

-and-

Peter Friedman\*  
1625 Eye Street, NW  
Washington, D.C. 20006  
Tel: (202) 383-5300  
Fax: (202) 383-5414  
pfriedman@omm.com

-and-

Elizabeth L. McKeen\*  
610 Newport Center Drive, 17th Floor  
Newport Beach, CA 92660  
Tel: (949) 823-6900  
Fax: (949) 823-6994  
emckeen@omm.com

*Attorneys for the Puerto Rico Fiscal  
Agency and Financial Advisory  
Authority and Puerto Rico Electric Power  
Authority*

**CERTIFICATE OF SERVICE**

We hereby certify that on this same date, we electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to counsel for the parties of record.

/s/Alana M. Vizcarrondo-Santana  
USDC-PR 301614